

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

IN RE:

CASE NO.: 3:11-BK-08099-PMG

ROLANDO REYES, KRISTEN REYES,

CHAPTER 13

DEBTOR.

MOTION TO WITHDRAW AS COUNSEL

The undersigned counsel for Bank of New York Mellon f/k/a The Bank of New York (the “Movant”), pursuant to Local Rule 2091-1, moves to withdraw his appearance as counsel for the Movant (Doc. No. 29) and states:

1. A Notice of Appearance was filed on behalf of the Movant by the undersigned’s predecessor in interest (Doc. No. 29).

2. The Movant was the servicer for a loan secured by a mortgage on property of the estate.

3. However, the Movant transferred all interest in the property to Nationstar Mortgage LLC in late 2013 (Doc. No. 159).

4. Thereafter, the Movant asked the undersigned to close his file regarding this matter.

5. The Movant consents to the undersigned’s withdrawal.

6. However, the Debtors have dragged this bankruptcy out for several years based on hearsay allegations related to the loan formally serviced by the Movant.

7. Therefore, the undersigned requests the Court’s approval since this is a contested matter.

8. Additionally, Nationstar Mortgage LLC separately retained the undersigned to represent its interests in this matter and a Notice of Appearance was filed on its behalf (Doc. No.

185).

WHEREFORE, the Movant respectfully requests that the Court enter an Order withdrawing the Notice of Appearance (Doc. No. 29), and grant any other relief deemed just and proper.

CERTIFICATE OF SERVICE

I CERTIFY that a true copy of the foregoing was served on April 7, 2014 by CM/ECF electronic filing to all registered users in this matter and by U.S. Mail to the non-registered user or users below.

Respectfully submitted by,

VAN NESS LAW FIRM, PLC
1239 E. Newport Center Drive, Suite 110
Deerfield Beach, FL 33442
Phone (954) 708-2328 ext. 110
Fax (954) 571-4003

/s Michael Gulisano
Michael Gulisano, Esquire
Florida Bar No.: 87573
mgulisano@vanlawfl.com

MAILING MATRIX:

Rolando Reyes, 1613 3rd Ave N., Jacksonville Beach, FL 32250

Kristen Reyes, 1613 3rd Ave N., Jacksonville Beach, FL 32250

Bank of New York Mellon f/k/a The Bank of New York, c/o Bank of America, N.A., 7105 Corporate Drive PTX-B-209, Plano, TX 75024